

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ALISSA FREDRICKS,  
  
Plaintiff, : Civil Action  
: No. 19-10331-RGS  
v. :  
MARKEL CATCO INVESTMENT : **ORAL ARGUMENT**  
MANAGEMENT LTD AND MARKEL CORP., : **REQUESTED**  
Defendants. :

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**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6) and on the basis of *forum non conveniens*, defendants Markel CATCo Investment Management Ltd and Markel Corp. (collectively, "Defendants") hereby move this Court to dismiss Plaintiff's Amended Complaint (ECF No. 13) with prejudice. The grounds for this Motion are set forth in the accompanying memorandum of law, Declaration of Alexander Potts QC, Appendix of Foreign Authorities, and Transmittal Declaration of James R. Carroll and its enclosed exhibit, which are submitted herewith.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(D), Defendants respectfully request oral argument on this Motion.

**LOCAL RULE 7.1 CERTIFICATION**

I, Christopher A. Lisy, hereby certify that I have conferred with counsel for Plaintiff in good faith, but the parties have been unable to resolve or narrow the issues presented in this Motion.

Dated: April 29, 2019

/s/ Christopher A. Lisy  
Christopher A. Lisy

Dated: April 29, 2019  
Boston, Massachusetts

Respectfully submitted,

/s/ James R. Carroll  
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